

App. No. 09/784,246
Amendment Dated January 6, 2005
Reply to Office Action of October 29, 2004

REMARKS/ARGUMENTS

Claims 1-47 remain in this application for further consideration in light of the foregoing remarks. The specification has been amended as set forth above to correct a minor typographical error. No new matter has been added.

I. Rejection of claims 1-47 under 35 U.S.C. § 103(a).

Claims 1, 4, 8-11, 14, 18-21, 23, 27-31, 34, 38-40, and 47 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,907,326 issued to Atkin et al. ("Atkin"), in view of U.S. Patent No. 5,596,698 issued to Morgan ("Morgan"), and in further view of U.S. Patent No. 5,442,782 issued to Malatesta et al. ("Malatesta"). Claims 2-3, 5-7, 12-13, 15-17, 22, 24-26, 32-33, and 35-37 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Atkin in view of Morgan and in further view of Malatesta as applied to claims 1, 11, 21, and 31 above, and further in view of U.S. Patent No. 5,835,912 issued to Pet ("Pet"). Applicant respectfully disagrees with the rejections for the reasons set forth below.

1. No Suggestion or Motivation to Modify the References.

There is no suggestion or motivation in any of the references that they may be modified in the manner suggested. Atkin pertains to a system and method for changing the cultural profile of different aspects of a windows system. (See Atkin at col. 4, lines 5-26). Atkin teaches, "the interaction portion of a program, such as toolbars and menus, may use a different cultural profile than the cultural profiles used by the data portion of a program." (Atkin at col. 4, lines 11-14). Atkin also teaches a drag-and-drop interface for changing cultural profiles on a windows system. (See Atkin at col. 4, lines 19-26). Succinctly stated, Atkin teaches a software system that allows

App. No. 09/784,246
Amendment Dated January 6, 2005
Reply to Office Action of October 29, 2004

a user to change the cultural layout of an application. (*See* Atkin at col. 4, lines 5-26). For example, a user may desire the controls of a word processing application to be in French but the typing input to be in English. (*See generally* Atkin at col. 4, lines 5-26).

Morgan does not even remotely relate to a system and method for changing the cultural aspects of a windows application as taught in Atkin. Morgan teaches an apparatus for recognizing handwriting and interacting with a student. (*See* Morgan at col. 3, lines 28-37). Morgan teaches that the apparatus may include a notebook type computer and that the notebook can process handwriting to teach, math, science, English and the like. (*See* Morgan at col. 4, lines 1-65). In passing, Morgan states that "[l]ocalization is possible within the scripting language, so that the TeachPad computer 10 invention can be easily adapted for any language." (Morgan at col. 4, lines 14-16). Here, Morgan is merely teaching that the software may be adapted for any language. Morgan does not teach a system and method for *changing the cultural aspects of a single program*. In fact, Morgan teaches directly away from such an invention. As opposed to teaching a system and method that may be switched between many cultures, Morgan teaches, "separate lessons for each language and culture." (Morgan at col. 14, lines 14-15). Stated another way, each culture must have a different "Teachpad" or accompanying software. (*See generally* Morgan at col. 14, lines 14-15). This teaching is directly contrary to Morgan. Accordingly, a person of ordinary skill in the art presented with problems associated with making windows applications multicultural as exhibited by Atkin, would hardly be disposed on any objective bases to consider a reference such as Morgan.

App. No. 09/784,246
Amendment Dated January 6, 2005
Reply to Office Action of October 29, 2004

Moreover, a person of ordinary skill in the art would not consider the Malatesta invention or the Pet invention. Malatesta pertains to a database application for creating and maintaining related international records. (*See* Malatesta at col. 2, lines 6-12). Malatesta teaches that data items can be stored in a base language with accompanying related copies of the data items represented in multiple languages. (*See* Malatesta at col. 2, lines 23-32). Conversely, Atkin is entirely unconcerned with storing, creating or maintaining multiple documents with different language bases. Regarding the Pet invention, Pet pertains to a database that is accessible to many cultures or countries. (*See generally* Pet at col. 1, lines 12-col. 4, line 33). Pet teaches storing, retrieving and modifying data in a database in multiple languages, concurrently. (*See generally* Pet at col. 1, lines 12-col. 4, line 33). Stated another way, a document may have several forms (e.g. English, German and French). (*See generally* Pet at col. 1, lines 12-col. 4, line 33). A French user may alter a document and the alteration will be evident to an English user viewing the document in English. (*See generally* Pet at col. 1, lines 12-col. 4, line 33). Atkin is entirely unconcerned with such teaching. Therefore, a person of ordinary skill in the art, concerned with the problems addressed in Akin, would not consider any of the aforementioned references. Accordingly, for the above reasons standing alone, Applicant believes the claims are allowable under 35 U.S.C. § 103(a).

2. All the Claim Limitations are Not Taught or Suggested.

Even if, for argument sake, the above references could be combined in the manner suggested, the above references fail to teach all the limitations of the present invention.

Moreover, any assertion otherwise fails to consider the prior art and the present invention *as a*

App. No. 09/784,246
Amendment Dated January 6, 2005
Reply to Office Action of October 29, 2004

whole. Applicant's independent claim 1 specifically recites the following elements that are not taught or suggested by any of the cited references:

"processing a request from an application to retrieve *localized language-dependent information* associated with a first language from a *localized data store*, the localized data store containing localized language-dependent information for a plurality of languages and a registry." (Emphasis added).

Applicants' independent claim 11 specifically recites the following elements that are not taught or suggested by any of the cited references:

"processing a request from an application to retrieve *localized language-dependent information* associated with a first language from a *localized data store*, the localized data store containing localized language-dependent information for a plurality of languages." (Emphasis added).

Applicant's independent claim 21 specifically recites the following elements that are not taught or suggested by any of the cited references:

"means for processing a request from an application to retrieve *localized language-dependent information* associated with a first language from the *localized data store* means."

Applicant's independent claim 31 specifically recites the following elements that are not taught or suggested by any of the cited references:

"an operating system coupled to the display, the *localized data store*, and the application, wherein the operating system is configured to process a request from the application to retrieve *localized language-dependent information* associated with a first language from the localized data store, provide requested localized language-dependent information from the localized data store to the application, and cause the display unit to display the localized language-dependent information." (Emphasis added).

App. No. 09/784,246
Amendment Dated January 6, 2005
Reply to Office Action of October 29, 2004

Applicant's independent claim 44 specifically recites the following elements that are not taught or suggested by any of the cited references:

"an operating system coupled to the display unit, the registry, the application and the file system, wherein the operating system is configured to (a) process a request from the application to *access the file system for non-localized language-dependent information* associated with a first language, (b) provide from the file system requested non-localized language-dependent information associated with the first language to the application, (c) process a request from the application to retrieve *localized language-dependent information associated with the first language from the registry*, (d) provide requested localized language-dependent information from the registry to the application, and (e) cause the display unit to display the requested *localized and non-localized language-dependent information*." (Emphasis added).

Applicant's independent claim 47 specifically recites the following elements that are not taught or suggested by any of the cited references:

"an operating system coupled to the display unit, the filename data store, and the application, wherein the operating system is configured to (a) process a request from the application to access the filename data store for a *localized filename associated with a first language*, (b) provide the requested localized filename from the filename data store to the application, and (c) cause the display unit to display the requested localized filename." (Emphasis added).

With regard to *non-localized language-dependent information*, the specification of the present invention states, in part, as follows:

"In this embodiment, the alternative resources 320 include non-localized resources in the various supported languages, which can be called by the application 340. *Non-localized resources include UI related information which does not need to be changed from mobile device to mobile device, and thus can be similar among many mobile devices. While at the factory, the alternative resources 340 can include language libraries for the languages in all of the countries that the mobile electronic device 100 may be shipped.* This system can advantageously simplify the manufacturing process, thereby reducing manufacturing costs." (Specification at page 6, lines 15-22). (Emphasis added).

App. No. 09/784,246
Amendment Dated January 6, 2005
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With regard to *localized language-dependent information*, the specification of the present invention states, in part, as follows:

The localized data store 330 is used to store localized information in the various supported languages. *That is, the localized data store 330 stores UI-related information that may change from mobile device to mobile device. For example, if the country in which the user resides changes the name of the time zone, the user can update a setting (e.g., in the registry) in the localized data store 330 with the new time zone name.* (Specification at page 6, lines 23-28). (Emphasis added).

The portion of the specification cited above is but one example from the specification of the terms "localized" and "non-localized" and does not represent the breath of these terms. These citations are for explanatory purposes only and not meant to impute any limitations into the claims apart from the claim language itself insofar as applicant asserts that the terms are clear.

The cited references do not teach or otherwise suggest all of the limitations that are recited in Applicant's independent claims 1, 11, 21, 31, 44, or 47. Neither Atkin, Morgan, Malatesta, nor Pet teach or otherwise suggest *localized data* as recited in the above independent claims. Atkin, Morgan, Malatesta and Pet pertain to *language based* applications or translation applications. Accordingly, for the reasons set forth in sections 1 and 2 of this Response, claims 1, 11, 21, 31, 44 or 47 are clearly allowable under 35 U.S.C. § 103(a).

Regarding claims 2-10, 12-20, 22-30, 32-43, and 45-46 of the present invention, Applicant asserts that the limitations of those claims are not taught or otherwise suggest by the cited art. Moreover, claims 1-10, 12-20, 22-30, 32-43, and 45-46 ultimately depend from independent claims 1, 11, 21, 31, 44, or 47, respectively. Claims 1, 11, 21, 31, 44, or 47 are

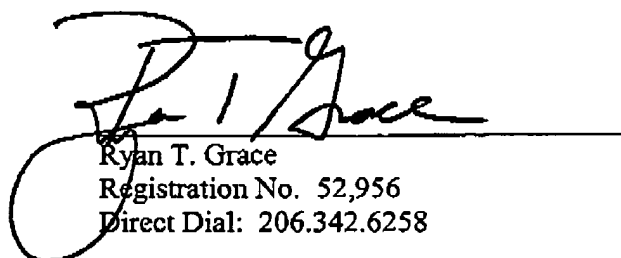
App. No. 09/784,246
Amendment Dated January 6, 2005
Reply to Office Action of October 29, 2004

thought allowable for the reasons set forth above. Therefore, Applicant asserts that claims 2-10, 12-20, 22-30, 32-43, and 45-46 are allowable for at least those same reasons.

In view of the foregoing amendments and remarks, all pending claims are believed to be allowable and the application is in condition for allowance. Therefore, a Notice of Allowance is respectfully requested. Should the Examiner have any further issues regarding this application, the Examiner is requested to contact the undersigned attorney for the Applicant at the telephone number provided below.

Respectfully submitted,

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